IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WESTERN PA CHILD CARE, LLC,
PA CHILD CARE, LLC, MID-ATLANTIC
YOUTH SERVICES CORP., CONSULTING
INNOVATIONS AND SERVICES, INC.,
GLADSTONE PARTNERS, LP and GREGORY R.:
ZAPPALA,
:

Plaintiffs

V.

ROBERT J. POWELL, DEBRA POWELL,
JILL MORAN, THE POWELL LAW GROUP,
P.C., VISION HOLDINGS, LLC, JANE SEBELIN,:
SEBELIN LAW OFFICES, P.C., JONATHAN
LANG; MATTHEW SLOCUM, and THE
SLOCUM FIRM, P.C.

Defendants

NOTICE OF VOLUNTARY DISMISSAL OF JANE SEBELIN AND SEBELIN LAW OFFICES, P.C.

AND NOW, come Plaintiffs, Western PA Child Care, LLC, PA Child Care, LLC, Mid-Atlantic Youth Services Corp., Consulting Innovations and Services, Inc., Gladstone Partners, LP and Gregory R. Zappala, and in reliance on the declaration attached hereto as Exhibit A, give notice of the voluntary dismissal of Jane Sebelin and Sebelin Law Offices, P.C., **WITHOUT PREJUDICE**.

Respectfully submitted,

/s/ Bernard M. Schneider Bernard M. Schneider Counsel for Plaintiffs

PA ID #32245 BRUCKER SCHNEIDER & PORTER FIRM ID # 789 300 Weyman Road Suite 320 Pittsburgh, PA 15236

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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WESTERN PA CHILD CARE, LLC, PA CHILD CARE, LLC, MID-ATLANTIC: YOUTH SERVICES CORP., CONSULTING INNOVATIONS AND SERVICES, INC., GLADSTONE PARTNERS, LP and GREGORY R. ZAPPALA,

Plaintiffs

Defendants

NO. 2:14-CV-00968

VS.

JUDGE JOY FLOWERS CONTI

ROBERT J. POWELL, DEBRA POWELL, : JILL MORAN, THE POWELL LAW GROUP, P.C., VISION HOLDINGS, LLC. JANE SEBELIN, SEBELIN LAW OFFICES, P.C., JONATHAN LANG, MATTHEW SLOCUM, and THE SLOCUM FIRM, P.C.,

Declaration of Jane S. Sebelin

Jane S. Sebelin, pursuant to 28 U.S.C. § 1746 declares as follows:

- 1. I am a partner in the law offices of Sebelin Law Offices, P.C. located at 120 S. First St., Lehighton, PA 18235 and submit this declaration in connection with Defendants', Jane S. Sebelin and Sebelin Law Offices, P.C. Motion to Dismiss Plaintiffs' Complaint pursuant to Federal Rules of Civil Procedure 12 (b)(6).
- 2. I am an attorney admitted to practice law in the Commonwealth of Pennsylvania, the United States Federal Court Middle and Eastern Districts of Pennsylvania.
- 3. I graduated from law school in 2002 and practiced law in Monroe County as a law clerk until April 2002.

- 4. From April 2002 to April 2007, I was an employee of the Powell Law Group, P.C.
- 5. In April 2007, I left the Powell Law Group, P.C. and began work at a different law firm in Palmerton, PA.
- 6. In 2010, Sebelin Law Offices, P.C. was formed.
- 7. While as an employee of the Powell Law Group, P.C., I never spoke with Defendants except a polite greeting when passing in the hall.
- 8. I have never attended any meetings with Plaintiffs.
- 9. I have never had any business dealings with any of the Plaintiffs in this action.
- 10. Plaintiffs in this action have never conferred any benefit upon me, or Sebelin Law Offices, P.C.
- 11. Neither I, nor Sebelin Law Offices, P.C., have any right to any attorney fees of Robert Powell, Jill Moran, or the Powell Law Group, P.C. now, in the past, or in the future.
- 12. I declare under penalty of perjury that the foregoing is true and accurate.

BY:

Jane Sebelin

SEBELIN LAW OFFICES P.C.

120 S First St.

Lehighton, PA 18235

P: 610-377-4800

F: 610-377-3626 jane@sebelinlaw.com

Dated: Lehighton, Pennsylvania

9/3/14

(412) 881-6620 (telephone) bmschn@aol.com (e-mail address)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice was served on all counsel of record on the 3^{rd} day of September, 2014 by ECF Notice.

BRUCKER SCHNEIDER & PORTER

By: /s/ Bernard M. Schneider
Bernard M. Schneider
Counsel for Plaintiffs